

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
ST. LOUIS DIVISION**

RONALD LEES, on behalf of Himself and
others similarly situated,

Plaintiff,

Case No. 4:13-cv-01411-SNLJ

v.

ANTHEM INSURANCE COMPANIES INC.,
d/b/a ANTHEM BLUE CROSS BLUE
SHIELD,

Defendant.

DECLARATION OF JOHN TAYLOR

I, John Taylor, declare, under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. Until June 30, 2014, I was the Director, Project Management & Quality Assurance for PossibleNOW. I held that position for five (5) years and have worked for the company for ten (10) years. My job responsibilities in my role as the Director, Project Management & Quality Assurance included initiating, planning, executing, supervising and closing information technology and software development projects that were directly related to supporting the compliance efforts of direct marketers. The majority of these projects involved processing call record data for telemarketers to determine if particular telephone numbers were callable under the provisions of the Telephone Consumer Protection Act (TCPA). During my ten year experience with PossibleNOW, I dealt with billions of rows of telemarketer calling data. This combined with the customer knowledge gained while designing custom compliance

solutions for customers provided me with a unique perspective on how telemarketers obtain their data, maintain their data and use their data in telemarketing activities. In 2005, we began to audit telemarketer calling records. Since that time I have led the effort to execute forensic analysis on calling records to determine their status against all of the various DNC lists, identify telemarketing and non-telemarketing calls, identify wireless telephone numbers, and identify calls made on the basis of EBR or evidence of consent.

2. As of July 1, 2014, I am the Director, Data Research and Analysis for Compliance Point. My job responsibilities in my role as Director, Data Research and Analysis include execution of telemarketing monitoring and enforcement programs, assisting clients with data analysis in support of civil actions under the TCPA, and assisting clients and counsel with data analysis in Federal Civil Investigative Demands (CID). Compliance Point is a wholly-owned subsidiary of PossibleNOW, Inc., and has a deep expertise in determining which telephone numbers are unique wireless (cellular) numbers and which are not.

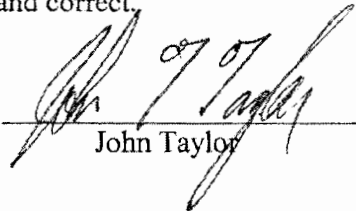
3. PossibleNOW maintains licensing agreements that allow PossibleNOW and Compliance Point the use of both the Interactive Marketing Solutions' Wireless Block Identifier™ list and the Neustar Number Portability List. PossibleNOW obtains and uploads the Interactive Marketing Solutions' Wireless Block Identifier™ on the first day of each month. PossibleNOW has the history of this list since its inception in 2003. PossibleNOW obtains the Neustar Number Portability List daily. PossibleNOW has the history of this list since its inception in 2004. I used these resources to determine if a record was on a wireless list at the date of call. This process uses standard data processing methods, is accurate, and highly repeatable. Once I identified the wireless numbers, counsel asked me to identify the unique wireless number in the data files.

4. PossibleNOW was provided with electronic files from Alta Resources, Inc. (Alta) that contained records of 4,290,228 telephone calls (the "Alta Dialed Numbers").

5. Using PossibleNOW's robust software and expertise, I determined which of the Alta Dialed Numbers were identified as wireless numbers or had been ported to a wireless carrier (the "Wireless Numbers"). After eliminating duplicate numbers, I determined the lists of Alta Dialed Numbers contained 830,593 unique Wireless Numbers.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 22, 2014.



John Taylor